

Schena, Cristeen

From: Matt Fragala <Mfragala@EHEinc.com>
Sent: Wednesday, March 05, 2014 10:50 AM
To: Tisa, Kimberly
Subject: RE: Estabrook Demolition

Categories: Red Category

Hi Kim

The revised plan incorporating these items was emailed to you yesterday. In addition here are the direct responses to the questions (marked in red). Please let me know if you have any additional questions or comments.

Is it possible to get written acceptance of this proposed modification from EPA by this Friday March 7th? The contractor is scheduled to start work on Monday March 10th.

Thanks again for your assistance with this project.

1. There is reference throughout this document to "PCB bulk product waste < 50 ppm". As previously indicated, this classification does not exist.
This reference has been removed from the revised plan that was issued on March 4, 2014. There are three classifications in the revised plan; PCB Bulk Product Waste, PCB Remediation Waste, and Excluded Product.
2. Table 3 contains reference to PCB bulk product waste < 50 ppm PCB. Again, no such classification.
This reference has been removed and the materials were classified as PCB Bulk Product Waste or PCB Remediation Waste.
3. Page 3. With respect to the brick, please note that per the 2012 PCB bulk product waste reinterpretation, the brick would have had to be classified as a PCB bulk product waste prior to removal of the caulk. Since the removal occurred prior to the 2012 Reinterpretation, it is unclear if the brick could still be classified as a PCB bulk product waste. Please confirm the presence of residual caulk on this substrate to support classification as a PCB bulk product waste. Otherwise, it may have to be managed as a PCB remediation waste. Regardless, the proposed disposal facility (RCRA hazardous waste landfill) could accept both waste streams.
The plan has been revised and this brick will be managed as PCB Remediation Waste.
4. With respect to classification of PCB bulk product waste as a MA-02 waste and a hazardous waste, EPA would encourage Lexington to discuss this matter with the MassDEP as other options may be available for management of this type of waste.
This item was discussed with the project team. PCB Bulk Product Waste will be disposed of at McKean County Landfill. A copy of the State Permit from the disposal facility that indicates that they are able to take PCB Bulk Product Waste with greater than 50 PPM PCBs has been obtained.
5. Table 5.4 identifies building substrates that will be removed/disposed of as a PCB waste. EPA has previous comments on the < 50 PCB bulk product waste classification. With that said, EPA notes that the brick > 4 inches from the caulk joint was not mentioned. How is the brick > 4 inches from the caulk joint to be managed?
This brick will be managed as a non-hazardous waste. It was recommended to the contractor that additional samples should be collected if this brick is going to be recycled.

6. With the exception of the brick referenced in item 5, above, please confirm that all other building materials are to be removed and disposed of in a permitted disposal facility (i.e., either TSCA-permitted landfill, RCRA hazardous waste landfill, or state-permitted non-hazardous waste landfill).
Yes, this is correct.
7. Page 29. There is reference to the “homogenous characteristics” of paint and caulk. This may be true for these types of products at the Site, but EPA’s experiences at other sites suggests otherwise where PCB concentrations in paints and caulks throughout a facility can vary widely even through visually they may appear similar.
Thank you for this information.
8. Table 6.5 and 6.6. Could you please confirm how the CMU adjacent to the caulk and the cove base was collected. If samples were collected and composited from multiple locations, it is not clear that the individual sample results are all < 50 ppm.
Each sample was collected in one location (the same CMU block). The samples were not composited from multiple locations.
9. Page 40, Section 12.2.1. There appears to be a slight discrepancy in the disposal plan for brick/concrete. Previously, it was indicated that brick and concrete within 4 inches of the caulk would be managed in a RCRA-C hazardous waste landfill. Here is it indicated that all brick and concrete would go to a RCRA Title D Landfill unless the sample fails TCLP.
This language has been updated in the report. All brick and concrete within 4 inches of the caulk will be managed as PCB Bulk Product Waste and will go to McKean. If the PCB remediation waste <50 ppm fail the TCLP it will also go to McKean. If PCB remediation waste <50 ppm passes it will go to Turnkey as PCB remediation waste <50 ppm.
10. EPA is not in agreement with the air monitoring action level as described in Section 12.3, especially given the location of the demolition project. Please consider the following:
This section of the report has been updated to include a similar series of actions levels for both PM10 and PM 2.5. We will be monitoring both parameters in real-time at Estabrook. The monitoring stations at Estabrook are state of the art and automated. They automatically notify us immediately (via email alert) if any of the action limits are being approached.

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 Please consider the environment before printing this email.

From: Tisa, Kimberly [mailto:Tisa.Kimberly@epa.gov]
Sent: Thursday, February 13, 2014 5:36 PM
To: Matt Fragala
Cc: Tisa, Kimberly
Subject: Estabrook Demolition

Matt:

We recently discussed the issue related to waste classification of PCB-contaminated materials to be generated during demolition of the Estabrook School in Lexington, MA. Of particular issue was the waste classification "PCB bulk product waste < 50 ppm". As I originally indicated to you there is no such classification. Rather, the waste codes associated with waste likely would be PCB bulk product waste; PCB remediation waste; and excluded PCB products. You indicated that you would revise the plan and resend.

A revised plan dated February 4, 2014 was received. This plan was submitted in accordance with Attachment 1, Condition 1 of the December 2011 Risk-Based Disposal Approval for the Site.

I have reviewed and provide the following comments:

11. There is reference throughout this document to "PCB bulk product waste < 50 ppm". As previously indicated, this classification does not exist.
12. Table 3 contains reference to PCB bulk product waste < 50 ppm PCB. Again, no such classification.
13. Page 3. With respect to the brick, please note that per the 2012 PCB bulk product waste reinterpretation, the brick would have had to be classified as a PCB bulk product waste prior to removal of the caulk. Since the removal occurred prior to the 2012 Reinterpretation, it is unclear if the brick could still be classified as a PCB bulk product waste. Please confirm the presence of residual caulk on this substrate to support classification as a PCB bulk product waste. Otherwise, it may have to be managed as a PCB remediation waste. Regardless, the proposed disposal facility (RCRA hazardous waste landfill) could accept both waste streams.
14. With respect to classification of PCB bulk product waste as a MA-02 waste and a hazardous waste, EPA would encourage Lexington to discuss this matter with the MassDEP as other options may be available for management of this type of waste.
15. Table 5.4 identifies building substrates that will be removed/disposed of as a PCB waste. EPA has previous comments on the < 50 PCB bulk product waste classification. With that said, EPA notes that the brick > 4 inches from the caulk joint was not mentioned. How is the brick > 4 inches from the caulk joint to be managed?
16. With the exception of the brick referenced in item 5, above, please confirm that all other building materials are to be removed and disposed of in a permitted disposal facility (i.e., either TSCA-permitted landfill, RCRA hazardous waste landfill, or state-permitted non-hazardous waste landfill).
17. Page 29. There is reference to the "homogenous characteristics" of paint and caulk. This may be true for these types of products at the Site, but EPA's experiences at other sites suggests otherwise where PCB concentrations in paints and caulks throughout a facility can vary widely even through visually they may appear similar.
18. Table 6.5 and 6.6. Could you please confirm how the CMU adjacent to the caulk and the cove base was collected. If samples were collected and composited from multiple locations, it is not clear that the individual sample results are all < 50 ppm.
19. Page 40, Section 12.2.1. There appears to be a slight discrepancy in the disposal plan for brick/concrete. Previously, it was indicated that brick and concrete within 4 inches of the caulk would be managed in a RCRA-C hazardous waste landfill. Here it is indicated that all brick and concrete would go to a RCRA Title D Landfill unless the sample fails TCLP.
20. EPA is not in agreement with the air monitoring action level as described in Section 12.3, especially given the location of the demolition project. Please consider the following:

CONTAMINANT	AIR ACTION LEVEL	REQUIRED ACTION
articulates (PM ₁₀)	Any visible dust	Implement corrective measures to control dust
articulates (PM ₁₀)	>75 µg/m ³ ^(a)	Increase application of dust controls
articulates (PM ₁₀)	> 150 µg/m ³ ^(a)	Continue wetting of source area. Suspend activities until problem c
articulates (PM ₁₀)	> 100 µg/m ³ ^(b)	Continue wetting of source area. Suspend activities until problem c

(a) Based on 5-minute weighted average

(b) Based on 8-hour weighted average

I would be glad to discuss the above, should you have any questions.

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)

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